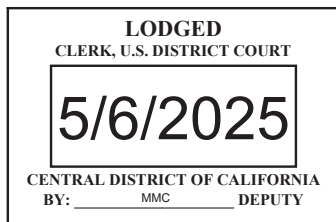


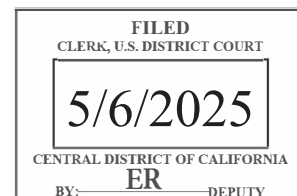
AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original☐ Duplicate Original

UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

ANTONIO MEDINA,

Defendant.

Case No. 2:25-MJ-02730-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 19, 2023 to September 1, 2023, in the county of Los Angeles in the Central District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 1591(a)(1)

Offense Description

Sex Trafficking of a minor or through Force, Fraud, or Coercion

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ Aaron Gutierrez

Complainant's signature

Aaron Gutierrez, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: May 6, 2025

Rozella A. Oliver

Judge's signature

City and state: Los Angeles, California

Hon. Rozella A. Oliver, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Aaron Gutierrez, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent for the Department of Justice, Executive Office for the United States Attorneys ("EOUSA") and have been so employed since August 2024. Previously, I was a Department of Homeland Security ("DHS") Customs and Border Protection ("CBP") Officer for approximately two years and a Homeland Security Investigations ("HSI") SA for over seventeen years. I graduated from the CBP Officer academy, the Criminal Investigator Training Program ("CITP"), and the HSI academy at the Federal Law Enforcement Training Center in Brunswick, Georgia. After graduating from the CITP and HSI academy, my first fifteen years as a HSI SA were with the Drug Enforcement Administration ("DEA").

2. From June 2005 to April 2007, I was a CBP Officer at the Los Angeles International Airport. I obtained training and experience with identifying counterfeit documents, counterfeit merchandise, illegal drugs, bulk cash smuggling, child sexual abuse material, common indicators and methods of deception, and common trends and concealment methods used by narcotics traffickers and bulk cash smugglers. I interviewed thousands of passengers from all over the world and became proficient with identifying legitimate trade and travel and with identifying human behavioral indicators commonly seen in narcotics

traffickers, smugglers, and others involved in illegal activity at the LAX port of entry.

3. From September 2007 to February 2020, I was a DEA Task Force Agent ("TFA") assigned to the Southern California Drug Task Force, High Intensity Drug Trafficking Area ("HIDTA") Group 46 in Los Angeles, California. The Los Angeles HIDTA is a DEA led task force with federal agents and local police officers who are deputized as federal task force officers. During this assignment I participated in dozens of investigations as a case agent and in subsidiary roles. These investigations often utilized court authorized wire and electronic intercepts that targeted criminal street gangs and mid to high level drug trafficking and money laundering organizations. I was a primary case agent for multiple federal investigations that resulted in convictions for racketeering, violent crimes in aid of racketeering, drug trafficking, money laundering, extortion, kidnapping, and other offenses. I authored numerous affidavits for search warrants and Title III court orders, participated in countless surveillances, and participated in dozens of search warrants of residences, vehicles, digital devices, and social media accounts. I am proficient with the Controlled Substances Act ("CSA"), drug identification, and the variety of coded communications used by criminal organizations.

4. From February 2020 to December 2022, I was simultaneously assigned to the HSI Orange County Financial Investigations Task Force and the DEA Orange County District Office ("OCDO") Cyber Investigations Group. During this time,

the DEA and HSI regularly collaborated in investigations targeting independent traffickers using the United States Postal Service, UPS, FedEx, the dark net, and social media to distribute illegal drugs and commit financial crimes such as aggravated identity theft and various fraud schemes. These investigations also targeted the unlicensed money remitters laundering drug traffickers' drug profits via cryptocurrency.

5. From January 2023 to August 2024, I was assigned to the HSI Orange County Child Exploitation Investigations Group ("CEIG"). The CEIG conducts investigations for the possession, distribution, and production of child pornography, and other forms of child exploitation, such as sextortion and trafficking minors for commercial sex. I regularly reviewed evidence of child pornography and child exploitation in various forms to include computer media, service providers such as Google and Apple, and the popular social media platforms X, Snapchat, Instagram, and Facebook. I participated in numerous investigations that resulted in the seizure of child sexual abuse material, evidence of sextortion, and evidence of trafficking minors for commercial sex.

6. I am currently assigned to the Criminal Investigation Division ("CID") in the United States Attorney's Office ("USAO") for the Central District of California. The CID conducts federal criminal investigations for a variety of offenses including violent crimes, financial crimes, human trafficking, public corruption, and various fraud schemes. The CID also

supplements and supports ongoing investigations conducted by the USAO with other federal and local law enforcement agencies.

II. PURPOSE OF AFFIDAVIT

7. This affidavit is made in support of a criminal complaint against and arrest warrant for Antonio Medina ("MEDINA") for a violation of 18 U.S.C. § 1591(a)(1) (Sex Trafficking of a minor or through Force, Fraud, or Coercion).

8. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates and times are on or about those indicated.

III. STATEMENT OF PROBABLE CAUSE

9. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. MEDINA Sex Traffics Minor Victim P.F.

10. On September 2, 2023, LAPD South Bureau Human Trafficking Officers and Detectives were monitoring prostitution activity along the "Figueroa Corridor."¹ Officers Sovick and

¹ The Figueroa Corridor is a 3.5 mile stretch of Figueroa Street between Slauson Avenue and Imperial Highway, notorious for prostitution activities.

Ruiz saw a young-looking black female ("minor victim") at the corner of Figueroa Street and 65th Street. In her report, LAPD Officer Lancaster stated the minor victim wore a "tiny black tank top with a black short mini skirt exposing her buttocks and a pink jacket."

11. Officers suspected minor victim was an underage sex worker and detained her for a Commercial Sexual Exploitation of Children ("CSEC") investigation. Minor victim admitted she was 16 years old.² Officers transported minor victim to LAPD's 77th Division for a human trafficking of a minor investigation.

12. Det. Lancaster and Sgt. Ikeda interviewed the minor victim. During the interview, which was summarized in their report, the minor victim stated the following:

a. She had worked as a commercial sex worker for a month and knew the Figueroa Corridor because she grew up in the area. Minor victim reported that she was in placement and needed money.

b. Minor victim initially stated she worked independently and didn't have a "pimp"; however, she later admitted she met a Hoovers gang member named Antonio Medina ("MEDINA") also known as ("AKA") "LT", AKA "Little Tony" a few days after working independently, and MEDINA became her pimp.

c. Minor victim described MEDINA as a male black who was "short and stubby," with a Hoover star tattoo on his chest.

² Minor victim's birth certificate confirms she was 16 years old at the time of this CSEC investigation.

d. Minor victim stated MEDINA's address was 436 W Maple Street in the city of Compton.

e. Minor victim explained her "trap" (daily earnings of a commercial sex worker) was set by MEDINA at \$1,000 per day. Minor victim stated MEDINA did not strictly enforce her minimum trap but said he would be upset if he learned she was not giving him all of her earnings. Minor victim described MEDINA as a "boyfriend pimp" and not aggressive.

f. Minor victim typically slept at MEDINA's house, where she paid his mortgage of \$2,000 a month. MEDINA had the minor victim working four days a week on 64th or 65th Street.

13. Officer Lancaster created a six-pack photograph lineup with MEDINA. Officer Herrera showed the six pack to minor victim and she positively identified MEDINA as her trafficker.

B. Evidence of MEDINA's Sex Trafficking on Minor Victim's Phone

14. Minor victim signed a consent form for her Apple iPhone 12 Pro MAX with the assigned number (818) 638-0524.

15. Minor victim opened her cellphone for officers and told them that the contact listed as "Mr.MakeItHappen," phone number (616)990-2217, was MEDINA. Next to the contact's name were two hands and a trophy emoji. Based on my training, experience, and conversations with other law enforcement officers investigating human trafficking, I know trophy emojis are a common symbol associated with pimps.

16. I reviewed the messages between MEDINA and minor victim that were discovered on minor victim's phone. Paragraphs a-j below summarize some of the relevant messages:

a. MEDINA advised minor victim that he was from Hoovers in the first several text messages.

b. MEDINA asked minor victim to send him photographs so he could post advertisements on Mega Personals for her. I know from training, experience, and conversations with other law enforcement officers that Mega Personals is a dating website that is commonly used for posting prostitution advertisements. Because a user must be 18 or older to establish an account, it is common for pimps trafficking minors to post commercial sex advertisements for the minors.

c. MEDINA and minor victim exchanged at least 20 messages in which MEDINA and minor victim discussed how much money minor victim made. These include an exchange in which MEDINA told minor victim she had to make \$1,200. Minor victim told MEDINA when she caught a date and how much she made. For example, on June 23, 2023, minor victim told MEDINA she was "bussin a date" and said she received "100 for head," which I know, based on my training and experience, refers to receiving \$100 for oral sex. On June 25, 2023, minor victim told MEDINA he "got me workin like a dog" and asked how much money she had made so far because she "lost count." MEDINA advised minor victim that she made \$540, and minor victim replied "sad" and "five more dates." The messages clearly show MEDINA collected the money from minor victim's commercial sex dates. For

example, on July 26, 2023, MEDINA wrote to minor victim "Let me know wen u done with tht last one so I can come get tht." Based on my training, experience, and the context of the messages, I know "come get tht," refers to MEDINA collecting the money that minor victim earned from her commercial sex dates.

d. The phone also showed the minor victim shared her location with MEDINA, which, based on my training and experience, is common for sex workers to do with their pimps, as it gives the pimp knowledge of his sex worker's whereabouts at all times. This further enables the pimp to maintain control over their sex workers, which in this case, is the minor victim.

e. On June 22, 2023, minor victim wrote to MEDINA, "cops ran me cause they said I look 16," and MEDINA replied, "but u not." The fact that officers stopped minor victim in June 2023 and again in September 2023 because she appeared to be a minor involved in commercial sex work tends to show that minor victim is youthful looking and that MEDINA recklessly disregarded or deliberately avoided learning her real age.³ At minimum, MEDINA had a reasonable opportunity to observe that she was a minor, particularly since the messages show that minor

³ Based on my review of minor victim's criminal history report, it does not appear that she was arrested or apprehended in a CSEC investigation in June 2023 when, according to her text messages, she encountered law enforcement. I know from training, experience, and conversations with other law enforcement officers that minors sometimes give false biographical information or present valid identification of another person to authorities. Specifically, minors acquire valid identification of an adult who they resemble in order to conceal their true age and identity during encounters with law enforcement or other authorities. Pimps are not only aware of this behavior, but they also often encourage it and assist minors in obtaining false identifications.

victim worked for MEDINA from approximately June 19, 2023 through the end of August 2023. By replying "but u not," MEDINA may have been attempting to maintain plausible deniability in the event minor victim's phone was seized by police (as it later was).

f. In a text message exchange on July 17, 2023, MEDINA wrote to minor victim, "u still young so I know u not goin to really understand but I'm here for u if u need me," showing MEDINA knew that minor victim was "young."

g. On August 2, 2023, minor victim wrote to MEDINA, "I been abused and all that so when shit like that happen I be ready to give up cause I left my mama and evb to get away frm that shit." Based on my training, experience, and the context of the messages as a whole, I know that "evb" refers to "everybody," and I interpret this message as minor victim telling or reminding MEDINA that she is a runaway who left her family to get away from abuse. Thus, if MEDINA did not have actual knowledge of minor victim's age, this message further put MEDINA on notice that minor victim was a minor.

h. In a text message on August 16, 2023, minor victim referred to being in "school" and having "4 assignments," noting that she didn't have as much time to make money for MEDINA. This message further put MEDINA on notice of minor victim's age or gave him another data point to observe that she was a school-aged girl.

i. MEDINA appears to be a "finesse pimp." In the text messages, MEDINA told minor victim that he loved her. He

told minor victim things like, I "wanna see us win," and I "just want u to achieve ur goals," and "I have ur best interest."

Based on my training and experience investigating human trafficking, I know that these types of statements are a form of psychological manipulation to condition the minor to believe that her pimp cares about her well-being and her future, which allows the pimp to profit off her while deluding her to think that she is investing in their collective future.

j. There are also messages supporting minor victim's statement that she lived with MEDINA for some time. For example, on July 6, 2023, MEDINA wrote to minor victim that he was "home," and when minor victim asked if he was okay, MEDINA replied, "I will be wen u here." Then when minor victim appeared to be upset with MEDINA on July 10, 2023, she wrote, "just lmk whenever u plan on goin home imma move all my stuff back to my house." That minor victim and MEDINA lived together also shows MEDINA had a reasonable opportunity to observe that minor victim was a minor.

k. On August 18, 2023, when minor victim stated she would leave MEDINA, MEDINA threatened, "And if I catch u it's all bad" and "U gone see and it ain't gone be me lmao u know how many ppl tell me wat u do," and "bet u won't walk fig on kids." Based on my training, experience, and the context of the messages as a whole, I know that MEDINA is threatening that if minor victim tries to leave him, he or one of his associates will physically harm her and that she will not be able to work on Figueroa ("walk fig"), which he swears to "on [his] kids."

C. Subscriber Records Confirm the Contact for "Mr.MakeItHappen" Belongs to MEDINA

17. In early November 2023, Officer Lancaster utilized LAPD department resources to determine that the cellphone carrier for phone number (616) 990-2217, was T-Mobile. Officer Lancaster obtained a search warrant for the subscriber information from T-Mobile for this phone number, authorized by the Honorable PJ Mirich on November 14, 2023, warrant number CJ24S00129.

18. Officer Lancaster reviewed the data she received from T-Mobile and confirmed that the phone number was subscribed to MEDINA at an address listed as 12628 S. Wilmington Ave, Compton, CA 90222.

D. MEDINA and Minor Victim's Cash App Application Shows Evidence of Sex Trafficking

19. On February 16, 2024, Officer Lancaster applied for a search warrant for Cash App accounts linked to MEDINA's identifying information, including his social security number and phone number 616-990-2217. She also requested information related to the minor victim's account, which she identified through minor victim's text messages with MEDINA as "lxlmissdtmm", and minor victim's phone number 818-638-0524. The same day, the warrant was approved by the Honorable Teresa Sullivan, warrant number CJ24S01269.

20. Officer Lancaster reviewed the data Cash App provided and found the following:

a. Cash App identified an account for MEDINA in his name, with account token number C_00cpjlmw, and cashtag alias

"lt2423." Based on my investigation, I believe that the "lt" in the cashtag alias refers to MEDINA's moniker "Lil Tony."

b. The data shows the minor victim sending MEDINA money 28 different times between June 21, 2023 and August 21, 2023, totaling \$1,506.40.

c. Both minor victim's and MEDINA's Cash App records show MEDINA sending minor victim \$30 on June 20, 2023. This coincides with a text message from the same day in which minor victim asked MEDINA if he could send her \$25 because an unknown person would not accept cash. Minor victim provided MEDINA with her Cash App account username "lxlmissdtmm."

d. On June 24, 2023, in the comment for a \$50 transaction minor victim wrote, "I got 50 more in cash." Based on the text messages and the statements from minor victim, MEDINA received this payment during the timeframe in which minor victim worked as MEDINA's commercial sex worker.

IV. TRAINING AND EXPERIENCE ON HUMAN TRAFFICKING INVESTIGATIONS

21. Those individuals who, through force, intimidation, fraud, enticement, and/or coercion, enlist other individuals to become prostitutes and engage in commercial sex acts, and who profit from the prostitution of others (human traffickers), are called "pimps." The "pimp" generally attempts to maintain a group of girls/women who will work as prostitutes for him/her, referred to as their "stable." The commercial sexual exploitation of an individual who works in the sex industry is commonly referred to as "The Life" or "The Game." A pimp proudly boasts about a real or illusory lavish lifestyle as a

form of recruitment and to maintain status. The pimp flaunts new and expensive clothing, jewelry, cars, phones, furniture, televisions and gaming systems, food and alcohol, entertainment, travel, large sums of cash, drugs, guns, tattoos, and other valuables to their victims and criminal associates. It is common for the pimp to make these assertions and exhibit this lifestyle in person, in phone conversations and text messages, and over the internet through various social media websites. Additionally, pimps do not regularly maintain legitimate employment but rather maintain this lifestyle through "unexplained wealth" via a variety of illicit activities including various fraud schemes, drug trafficking, burglaries, and primarily, the proceeds obtained from their victims performing commercial sex acts.

22. Pimps tend to locate, identify, entice, coerce, recruit, or force their victims into the prostitution lifestyle through several methods. The act of being recruited into the prostitution lifestyle and successfully caused to conduct commercial sex acts as a prostitute for a pimp, is referred to as being "turned-out." Pimps may use one or a combination of methods to effectively "turn-out" a victim:

a. One common method includes initiating a pseudo-romantic relationship in which the pimp will coerce and/or entice the victim into a romantic or boyfriend/girlfriend relationship. Once the victim believes the pimp likes him/her and will care for him or her, the victim will usually have sex with the pimp. This sex act may be consensual (though if the

sex is with a minor and the pimp is an adult it will still constitute statutory rape) or a violent rape. After the pimp has sex with the victim, the pimp explains the victim needs to prostitute for the pimp so that the "couple" has financial security or the ability to purchase desired objects and commodities.

b. Another common method includes giving false hope to a victim for a chance at a better life and/or job opportunities. Through fraud and deceit, the pimp lures a victim into a friendly and consensual encounter, or even multiple encounters, under the guise the pimp will care and provide for him/her (commonly referred to as a "sugar daddy") or give/broker employment to the victim. Subsequently, the pimp changes their demeanor and explains that the victim will actually serve as a prostitute for the pimp. The pimp may ultimately assault, intimidate, threaten, rape, or torture the victim until he/she submits and ultimately prostitutes for the pimp.

c. Another method of initially obtaining and maintaining a victim as a prostitute, includes kidnap, rape, torture, physical force, physical abuse, verbal abuse, psychological abuse, threats and intimidation, and assaults of other prostitutes in front of a victim. Similarly, pimps may impose their status or affiliation with gangs as a form of control and intimidation and employ gang members for purposes of threats or actual physical harm, extortion, or robbery of the victim.

d. When a victim is properly "turned-out," it is common for the victim to experience a dynamic with his/her pimp that is similar to the cycle of domestic violence, and/or the Stockholm syndrome victims sometimes experience with their pimp. Victims often become accustomed to the lifestyle and form a sort of attachment to, or dependency on, the pimp. Others may feel trapped or too helpless to escape. The concept of the term "in-pocket" refers to remaining faithful to the pimp and/or following the rules of "The Game." In contrast, the term "out-of-pocket" refers to a prostitute being unfaithful to the pimp by looking at and/or talking to another pimp or working as a prostitute for another pimp (referred to as "choosing up"); not obeying the pimp; not providing the pimp with sufficient proceeds; or otherwise breaking the rules.

23. Pimps seek to dominate, control, and manipulate their victims, and do so through a range of methods involving force, fraud, or coercion, to include charm and charisma, the allure of a glamorous lifestyle, deception and false promises, drugs and alcohol, verbal threats, physical force, and brutal physical and sexual assaults or torture. Pimps consider their victims as their own property and believe that the victim should be submissive and subservient. Pimps want their victims to need and depend on them for survival or become infatuated and obsessed with them, to maintain power and control over the victims. Pimps view their victims as a source of income, a business commodity, and as something disposable and replaceable.

24. Some juveniles are brought into the prostitution lifestyle as early as age 12-14. Juvenile prostitutes are commonly runaways and/or come from troubled homes and foster homes. Juveniles have also been recruited from schools, gangs, and the Internet. Most juveniles involved in prostitution have pimps who can engage in certain activities, such as booking hotel/motel rooms, that a minor may not be able to do on his or her own. Many juveniles are lured into the lifestyle or initially begin a consensual, romantic, dating relationship with the pimp, who then turns them into a prostitute. Individuals who pimp minor prostitution victims sometimes produce, collect, and/or possess digital images/videos of those victims in the form of child pornography.

25. The most prevalent means by which pimps utilize their victims as prostitutes are (1) through street prostitution along portions of streets commonly known for high volume prostitution activity, referred to as "the track" or "the blade;" (2) appointments made with or for the victim to engage in commercial sex acts at a hotel/motel, referred to as "in-calls" and "out-calls;" and (3) posting advertisements for dating, "escort" and "massage" services online. Several common "tracks" exist in and around the Los Angeles-area, including Figueroa Street and Western Avenue in South Los Angeles, Sepulveda Boulevard in the San Fernando Valley, and Long Beach Boulevard in Compton. Additionally, the cities of Palmdale, Long Beach, Pomona, and Anaheim are other common locations around the Los Angeles-area for prostitution/human trafficking activity. Pimps commonly

require victims to work long hours in austere conditions and perform commercial sex acts with complete strangers.

26. The term "daddy" is commonly used by prostitutes when referring to their pimp. The pimp's cellular telephone number is often programmed as "daddy" in the prostitute's cellular telephone. Pimps frequently refer to prostitutes as "bitches" and/or "hoes." The term "folks/family" also refers to the pimp that a victim works for and other prostitutes in "the stable." A more senior prostitute in the stable that the pimp has serving as a pseudo-supervisor is referred to as the "bottom" or "bottom-bitch." Pimps are known to have a high turnover rate of prostitutes and, generally, seek to increase the size of their "stable." The term "date" or "trick" is street vernacular for a prostitute engaging in a commercial sex act with a paying customer, also known as a "trick" or "john."

27. Pimps generally receive all the proceeds that the victim receives for performing his/her commercial sex acts. Furthermore, it is common for pimps to wait in the vicinity of where their victims are performing commercial sex acts in order to provide "protection" for them should the customer become violent with the victim or not pay for the sexual services; to transport her to/from their housing, next "date," or other locations; to resupply the victim with condoms or miscellaneous items; and to collect the proceeds they earn from their commercial sex acts. Many victims are required to return to the pimp after each "date" in order to provide the pimp with their proceeds, and some may make electronic payments to the pimp for

the above types of services completed or arranged for by the pimp as well as for any fees or proceeds due to the pimp.

28. Pimps facilitate prostitution by transporting and/or causing the transportation of the prostitutes to locations where the prostitution occurs, such as "the tracks" and motels/hotels. The pimps, at times, transport prostitutes across state lines for the purpose of prostitution. Prostitutes and/or pimps often stay in motels/hotels for the purposes of conducting prostitution activities locally and when they travel. Often, the pimps rent or register the hotel rooms on behalf of their prostitutes. The pimps utilize the proceeds earned during acts of prostitution to purchase food, lodging, clothing, and other items for themselves and their prostitutes.

29. I have viewed numerous prostitution advertisements posted on websites online, including Mega Personals. These websites allow pictures to be posted as part of the advertisements. Subjects who utilize the Internet to post prostitution-related advertisements often use photographs in the advertisements that show a nude or semi-nude prostitutes. Online advertisements for prostitution often contain codes for the services provided. For example, the term "in-calls only" means the customer will respond to a location provided by the prostitute for the sexual transaction, and the term "donation" or "roses" is often used to mean the cost for the sexual transaction.

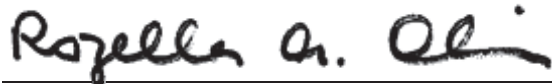
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V. CONCLUSION

30. For all the reasons described above, there is probable cause to believe that MEDINA violated 18 U.S.C. § 1591(a)(1) (Sex Trafficking of a minor or through Force, Fraud, or Coercion).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 6th day of May,
2025.

A handwritten signature in black ink, appearing to read "Rozella A. Oliver", is written over a horizontal line.

HONORABLE ROZELLA A. OLIVER
UNITED STATES MAGISTRATE JUDGE